



ARKANSAS
Department of Environmental Quality

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January 6, 2014

USEPA Region 6
Attn: Mr. Stephen Tzhone
Mail Code: 6SF
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

**RE: Groundwater Remedy Evaluation – New Cricket Spring
Arkwood, Inc. Site, Omaha, Arkansas,
EPA ID# ARD084930148; AFIN# 05-00003
Dated November 2013**

Dear Mr. Tzhone:

The Arkansas Department of Environmental Quality - Hazardous Waste & Water Division (ADEQ) has received the Groundwater Remedy Evaluation - New Cricket Spring Treatment for the Arkwood, Inc. Site, Omaha, Arkansas, dated November 2013. After review, the ADEQ has the following comments:

- 1) **Data Summary (paragraph 4), page 10:** *"The Arkansas Department of Environmental Quality (ADEQ) has established a clean-up standard of 15.57 µg/L PCP based on the State's chronic water quality standard."*

As mentioned in the October 7, 2013 letter to the United States Environmental Protection Agency (USEPA) from ADEQ, the maximum contaminant level (MCL) of 1 ug/L would apply to water discharging at New Cricket Spring should the water become accessible as a drinking water source.

- 2) **Sampling Frequency Analysis (Table 8), page 11:**

The averaging of analytical data for pentachlorophenol (PCP) in Table 8 is not appropriate when the high standard deviations are taken into account. ADEQ also considers that the cumulative analytical results should be plotted together with the respective flow data at New Cricket Spring to facilitate evaluation of the data set (i.e., line-graph based on a Microsoft Excel spreadsheet). Additionally, calculations should be performed to provide report data indicating the cumulative daily amount of pentachlorophenol (PCP) the environment would be receiving if it were not being treated to the groundwater MCL.

- 3) **Conclusions and Recommendations, page 12:**

ADEQ approves reducing the frequency of sampling and testing of water discharging from New Cricket Spring to quarterly, subject to continued operation of the ozone

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

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treatment system meeting the groundwater clean-up standard (i.e. $<1.0 \mu\text{g/L}$) at all times. ADEQ also approves permanent cessation of the injection of groundwater to supplement flow at the spring.

If you have any questions or concerns, please contact me at 501-682-0852 or via e-mail moix@adeq.state.ar.us.

Sincerely,



Mark Moix
Engineer, PE
Technical Branch
Hazardous Waste Division

cc: Ruben Moya, EPA Region 6